

**REMARKS**

Claims 2, 4, 5 and 8-20 are pending in the present application. Claims 2, 4, 5 and 8-12 have been amended. Claims 13-20 have been presented herewith. Claims 1, 3, 6 and 7 have been canceled.

**Election of Species**

Applicants acknowledge the comments regarding the Election of Species as offered by the Examiner on page 2 of the current Office Action dated April 19, 2005. Applicants however wish to emphasize that in the Response to Election of Species Requirement dated March 9, 2005, traversal of the requirement was raised merely with respect to the Examiner's position in the Election of Species Requirement dated February 9, 2005, that no claims are generic. Applicants merely asserted that claim 1 should be considered generic, and thus examined along with claims 2 and 3 of elected Species I.

Further responsive to the Election of Species Requirement dated February 9, 2005, **Applicants respectfully submit that claim 15 as presented herewith is generic.** Also, in view of this Amendment, the following listing is respectfully submitted to identify the claims as currently pending with respect to the Species as identified by the Examiner.

Species	Claims
I	2, 13, 14 and 16-18
II	4
III	5
IV	19 and 20
VI	8
VII	9
IX	11
X	10
XI	12

Applicants respectfully request examination of claims 2, 13, 14 and 16-18 as corresponding to elected Species I, along with generic claim 15. In the event that claim 13 is found allowable, the Examiner is respectfully requested to rejoin claims 4, 5 and 12 as dependent upon claim 13, which should also be found allowable. Moreover, in the event that generic claim 15 is found to be allowable, the Examiner is respectfully requested to rejoin claims 8-11, 19 and 20 as dependent upon claim 15, which should also be found allowable.

**Priority Under 35 U.S.C. 119**

Applicants note the Examiner's acknowledgment of the Claim for Priority under 35 U.S.C. 119, and receipt of the certified copy of the priority document.

**Claim Rejections-35 U.S.C. 102**

Claims 1-3 have been rejected under 35 U.S.C. 102(b) as being anticipated by the Takahashi et al. reference (Japanese Patent Publication No. 2001-257310). The Examiner has identified U.S. Patent No. 6,765,299 as an English language equivalent of the Takahashi et al. reference. This rejection, insofar as it may pertain to the presently pending claims, is traversed for the following reasons.

The semiconductor device of claim 13 includes in combination a first semiconductor chip "having a front side, a back side, and first pad electrodes formed on the front side and electrically connected to an integrated circuit formed on the front side"; a first conductive pattern "which is composed of a first conductive layer and which is electrically connected to one of the first pad electrodes"; a second conductive pattern "which is composed of the first conductive layer and which is electrically connected to a second one of the first pad electrodes and another of the first pad electrodes adjacent to the second one of the first pad electrodes"; first post electrodes; a second semiconductor chip "having a front side, a back side, and second pad electrodes formed on the front side thereof, the second semiconductor chip being mounted on the front side of the first semiconductor chip"; a third conductive pattern; an encapsulating

resin; and external terminals. Applicants respectfully submit that the Takahashi et al. reference as relied upon by the Examiner does not disclose these features.

In view of the comments as provided in the current Office Action, the Examiner would presumably interpret semiconductor chip 101 as illustrated in Fig. 3 and as including pads 102 thereon as the first semiconductor chip of claim 13. The Examiner would also presumably interpret interconnection 305 as the second conductive pattern of claim 13. However, interconnection 305 is not disclosed or illustrated as electrically connected to a pad electrode and another adjacent pad electrode of semiconductor chip 101, as would be necessary to meet the features of claim 13. That is, each interconnection 305 in Fig. 3 of the Takahashi et al. reference is shown as electrically connected to a single pad 102 of semiconductor chip 101. Applicants therefore respectfully submit that the semiconductor device of claim 13 distinguishes over the Takahashi et al. reference as relied upon by the Examiner, and that this rejection, insofar as it may pertain to claims 2, 13 and 14, is improper for at least these reasons.

The semiconductor device of claim 15 includes in combination a first semiconductor chip "having a front side, a back side, and first pad electrodes formed on the front side and electrically connected to an integrated circuit formed on the front side"; a first conductive pattern "which is composed of a first conductive layer and which is electrically connected to one of the first pad electrodes"; a second conductive pattern "which is composed of the first conductive layer and which is electrically connected to a second one of the first pad electrodes and another of the first pad electrodes adjacent

to the second one of the first pad electrodes"; first post electrodes; a second semiconductor chip "having a front side, a back side, and second pad electrodes formed on the front side thereof, the second semiconductor chip being mounted on the front side of the first semiconductor chip"; an encapsulating resin; and external terminals "which are formed over the encapsulating resin and which are electrically connected to the second conductive pattern and at least one of the second pad electrodes".

Applicants respectfully submit that for at least somewhat similar reasons as set forth above with respect to claim 13, the Takahashi et al. reference does not disclose a second conductive pattern. Applicants therefore respectfully submit that the semiconductor device of claim 15 distinguishes over the Takahashi et al. reference as relied upon by the Examiner, and that this rejection, insofar as it may pertain to claims 15-18, is improper for at least these reasons.

### Conclusion

Applicants respectfully submit that independent claims 13 and 15 should be allowable over the prior art of record for at least the above reasons. Accordingly, the Examiner is respectfully requested to rejoin claims 4, 5, 8-12, 19 and 20 as respectfully dependent upon claims 13 and 15, which should also be allowable for at least the same reasons as claims 13 and 15.

The Examiner is respectfully requested to reconsider and withdraw the

corresponding rejection, and to pass all the claims of the present application to issue, for at least the above reasons.

In the event that there are any outstanding matters remaining in the present application, please contact Andrew J. Telesz, Jr. (Reg. No. 33,581) at (571) 283-0720 in the Washington, D.C. area, to discuss these matters.

Pursuant to the provisions of 37 C.F.R. 1.17 and 1.136(a), the Applicants hereby petition for an extension of three (3) months to October 19, 2005, for the period in which to file a response to the outstanding Office Action. The required fee of \$1020.00 should be charged to Deposit Account No. 50-0238.

If necessary, the Commissioner is hereby authorized in this, concurrent, and future replies, to charge payment for any additional fees that may be required, or credit any overpayment, to Deposit Account No. 50-0238.

Respectfully submitted,

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